

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X		
GLENN LEGER, on behalf of himself and all others	:	16 Civ. 6545 (PKC) (PK)
similarly situated,	:	
	:	
Plaintiff,	:	DECLARATION OF
	:	<u>DOYLE C. SANDERLIN</u>
- against -	:	
	:	
CONRAD KALITTA and KALITTA AIR, LLC,	:	
	:	
	:	
Defendants.	:	
-----X		

I, Doyle C. Sanderlin, declare and state as follows:

1. I am employed by Kalitta Air, LLC ("Kalitta Air") as the Director of Operations, Vice President and General Manager, and I have been employed in this capacity since November 2000.
2. I have personal knowledge of the facts set forth herein.
3. I reside and work in Ypsilanti, Michigan, which is Kalitta Air's headquarters.
4. As the Director of Operations, Vice President and General Manager of Kalitta Air, I am responsible for, among other things, negotiating and executing contracts on Kalitta Air's behalf for flights which fly in and out of airports throughout the United States, including John F. Kennedy Airport. These contracts are entered into between Kalitta Air and the federal government, including the military and the United States Transportation Command as well as private companies. The contracts generally provide for Kalitta Air to pick up and deliver cargo to various locations in the United States, and around the world. I am also responsible for negotiating and executing contracts between Kalitta Air and sub-contracting companies, which also provide for Kalitta Air to pick up and deliver cargo either within the United States or internationally. I have performed this work in Ypsilanti since 2000, and I was responsible for

negotiating these contracts throughout Glenn Leger's employment with Kalitta Air.

5. The flight schedules for the aforementioned flights are set in Ypsilanti, Michigan, and were set in Ypsilanti, Michigan throughout Glenn Leger's employment with Kalitta Air.

6. In my role as described above, I do not travel to John F. Kennedy Airport or elsewhere in New York. All of the work that is relevant to Glenn Leger's claims is performed in Ypsilanti, Michigan.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 4, 2017



DOYLE C. SANDERLIN